

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**In Re: JAMES BAILEY and  
GWENDOLYN J. BAILEY**

**CHAPTER 13  
NO. 14-13318 JDW**

**Internal Revenue Service  
P O Box 7346  
Philadelphia, PA 19101-7346**

**NOTICE**

YOU ARE HEREBY NOTIFIED that a written response to the Objection to Secured Claim of Internal Revenue Service must be filed via ECF if you are registered with the Electronic Case Filing system, or alternatively filed with:

David J. Puddister, Clerk  
U.S. Bankruptcy Court  
Thad Cochran, U.S. Courthouse  
703 Highway 145 North  
Aberdeen, MS 39730

with a copy served on Robert Gambrell, attorney for the debtor(s) and the Chapter 13 Trustee, on or before thirty (30) from the date of this notice, or the Court may enter a Confirmation Order, or in the alternative, may enter an order ex-parte, either of which shall sustain this Objection to Secured Claim of Internal Revenue Service and shall determine the amount of interest allowed to be charged, if any is allowed at all, shall set the value of the collateral, and the manner in which the claim shall be treated and paid by the trustee. The entry of the an ex-parte order or a confirmation order shall grant all relief requested therein. In the event a written response is filed, the Court will notify you of the date, time and place of the hearing thereon.

DATED: 04/28/15  
CHAPTER 13 TRUSTEE:  
Locke Barkley  
P. O. Box 55829  
Jackson, MS 39296  
(601)355-6661

/s/ Robert Gambrell  
Robert Gambrell, Atty for Debtor(s)  
101 Ricky D. Britt Blvd., Ste. 3  
Oxford, MS 38655  
(662)281-8800 / Fax: 662-202-1004  
MS Bar # 4409

**IN THE UNITED STATES BANKRUPTCY COURT  
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**In Re: JAMES BAILEY and  
GWENDOLYN J. BAILEY**

**CHAPTER 13  
NO. 14-13318 JDW**

**OBJECTION TO SECURED CLAIM OF INTERNAL REVENUE SERVICE**

COMES NOW, Debtors, by and through undersigned counsel, and file this Objection to Secured Claim of Internal Revenue Service to the following pre-petition claim and requests the Court to set the amount of the claim, or to set the value of the collateral for purpose of plan confirmation, or to determine the manner in which the arrears claim shall be treated and paid by the trustee:

DESCRIPTION OF COLLATERAL: equity in all property

The amount of Claim #9: \$114,475.19

TREATMENT: The secured claim will be limited to a value of no greater than \$45,921.34, and said value shall be paid through the plan plus interest at the rate of 3.0% over the life of the plan. Upon payment of the claims in accordance with Section 1325(a)(5) of the Bankruptcy Code, unless otherwise ordered by the Court, the creditors shall release their liens and otherwise comply with applicable non-bankruptcy law.

DATED: 04/28/15

/s/ Robert Gambrell  
Robert Gambrell, Atty for Debtors

CERTIFICATE OF SERVICE

I, ROBERT GAMBRELL, Attorney for the above listed Debtors, do hereby certify that the following have been served electronically via ECF with a copy of the above Objection to Secured Claim of Internal Revenue Service and Notice of said Objection:

Henry G. Hobbs, Jr.: Acting U. S. Trustee: USTPRegion05.JA.ECF@usdoj.gov  
Locke D. Barkley: sbeasley@barkley13.com

I, further certify that I have this date mailed postage prepaid, a true and correct copy of said Objection and Notice to the following:

Internal Revenue Service  
P O Box 7346  
Philadelphia, PA 19101-7346

U. S. Attorney for the Northern District of Mississippi  
900 Jefferson Ave.  
Oxford, MS 38655

This the 28<sup>th</sup> day of April, 2015.

/s/ Robert Gambrell  
ROBERT GAMBRELL